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January 24, 2012

Shannon Stewart
Bureau of Land Management
RE: Solar Energy Draft PEIS
Argonne National Laboratory
9700 S. Cass Ave. – EVS/240
Argonne, IL 60439

Dear Ms. Stewart,

On behalf of Cochise County, I thank you for the opportunity to provide comments on the Supplement to the Draft Solar Energy Programmatic Environmental Impact Statement (PEIS), the long-term plan and suitability analysis for large-scale solar energy development on public lands in the Southwest.

Like many communities in the Southwest, public lands are deeply woven into the socioeconomic fabric of Cochise County. The BLM's effort to evaluate public lands for optimal large-scale solar development sites represents an attentive and responsible approach, and is a welcomed opportunity to provide meaningful local input on national energy policy. On a regional level, large land allocations in Arizona directed at solar development will help advance the State's minimum renewable energy standard (REST) goal of 15% energy production by 2025. However, perhaps more importantly, this effort serves as a remarkable opportunity to enhance and galvanize a long-term positive working relationship with the BLM based on coordination, cooperation and the spirit of partnership.

We support much of the plan as proposed in the revised Preferred Alternative. And in light of the proposed SunZia Transmission (500kV) and Southline Transmission projects (345kV), both of which would cross Cochise County and are in proximity to expansive BLM lands, we support large-scale solar development in those areas. As added assurance that solar development on public lands within Cochise County occurs in a conscientious manner, the BLM must:

- Provide ample and reasonable opportunities for Cochise County and the public to review proposed solar energy zones and provide comments on the final plan.

- Ensure that large-scale solar energy projects are directed to public lands within Cochise County that reflect the low-conflict approach of the revised Preferred Alternative.

Increasing renewable energy production is a major public policy decision. At the heart of this question is not simply the issue of siting utility-scale solar energy facilities, but also how the BLM should promote and incentivize solar energy production. Therefore:

- A comprehensive analysis comparing energy production potential, land requirements, and environmental and socioeconomic impacts of utility-scale power generation should be undertaken. This is recommended so that the BLM, local governments and the public will be better equipped to make critical decisions regarding how and if large-scale solar projects should be incentivized in order to help minimize solar projects on public lands that hold significant recreational, tourism and wildlife value.

Broadly speaking, solar development has few negative socioeconomic impacts. However, there is the potential for unreasonable negative impacts for Cochise County residents living in proximity to large-scale solar developments. For example, it may be necessary for construction vehicles to pass through communities to access project sites, thereby increasing local traffic and transient dust. Solar developments may also affect a community's viewshed, which may compromise quality of life. Although communities in proximity to large-scale solar development typically incur the most impact, currently, a compensation program for residents or communities impacted by solar development does not exist. We recommend that the BLM develop a funding program whereby a portion of solar development lease payments are distributed among affected communities to, for example, augment funding for public services.

Furthermore, in the long-term, we identify the need for a comprehensive and strategic landscape level plan that addresses large-scale solar development, one that is coordinated with local agencies and addresses private *and* public lands. This will strengthen opportunity for both the County and the federal government to work together in a coordinated and effective way that will set the stage for a more comprehensive process.

Finally, our recommendation for a higher level of intergovernmental coordination and collaboration regarding any portions of any solar energy projects proposed in the County would provide us with more meaningful NEPA input, and would assure consistency with the County's Comprehensive Land Use Plan (and any other duly adopted land use or transportation plans).

Thank you for the opportunity to provide comments and for considering our recommendations. We also thank you for supporting a working environment based upon coordination, cooperation, partnership, and open dialogue.

Sincerely,

Richard R. Searle, Chairman, Cochise County Board of Supervisors